

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

| | | |
|---|---|--------------------------------|
| JELENA SCHULTZ, on behalf |) | |
| of herself and others similarly situated, |) | |
| |) | |
| and |) | |
| |) | |
| THOMAS MILLER, on behalf of |) | |
| himself and others similarly situated |) | |
| |) | Case No. 1:15-CV-00594-TSE-MSN |
| <i>Plaintiffs,</i> |) | |
| |) | |
| v. |) | |
| |) | |
| MGA RESEARCH CORPORATION, |) | |
| |) | |
| <i>Defendant.</i> |) | |

NOTICE OF SETTLEMENT

The Parties file this Notice to advise the Court that the Parties have reached a settlement agreement in the above-captioned matter. The settlement documents are in the process of being finalized. Once the settlement documents are executed, the Parties will file with the Court a dismissal of all claims by Plaintiffs, with prejudice.

In light of the settlement, this further confirms that no responsive pleadings are required of Defendant.

WHEREFORE, the Parties respectfully request that this Honorable Court enter an order removing this case from the Court's trial docket and permitting the parties 30 days to submit a notice of dismissal or stipulation of dismissal.

Respectfully submitted,

Dated: June 11, 2015

By: /s/ Virginia R. Diamond
Virginia R. Diamond
VA State Bar No. 20992
Craig A. Brown
Virginia State Bar No. 29385
Attorneys for Plaintiffs
ASHCRAFT & GEREL, LLP
4900 Seminary Road, Suite 650
Alexandria, VA 22311
Telephone: 703.627.5510
Facsimile: 703.820.0630
vdiamond@ashcraftlaw.com
cbrown@ashcraftlaw.com

Dated: June 11, 2015

By: /s/ Scott McIntosh
Scott McIntosh
VA State Bar No. 43015
Attorneys for Defendant
QUARLES & BRADY LLP
1700 K Street, N.W.
Suite 825
Washington, D.C. 20006
Telephone: 202.372.9512
Facsimile 202.372.9596
Scott.McIntosh@quarles.com

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on June 11, 2015, the foregoing was filed with the Court's electronic filing system and served upon the following, by operation of the Court's electronic filing system:

Virginia R. Diamond
VA State Bar No. 20992
Craig A. Brown
Virginia State Bar No. 29385
Attorneys for Plaintiffs
ASHCRAFT & GEREL, LLP
4900 Seminary Road, Suite 650
Alexandria, VA 22311
Telephone: 703.627.5510
Facsimile: 703.820.0630
vdiamond@ashcraftlaw.com
cbrown@ashcraftlaw.com

By: /s/ Scott McIntosh
Scott McIntosh
VA State Bar No. 43015
Attorneys for Defendant
QUARLES & BRADY LLP
1700 K Street, N.W.
Suite 825
Washington, D.C. 20006
Telephone: 202.372.9512
Facsimile: 202.372.9596
scott.mcintosh@quarles.com